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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION  
DEVELOPMENT, LLC, a Delaware Limited  
Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a  
TIMESHARE EXIT TEAM, a Washington  
Limited Liability Company; BRANDON REED,  
an individual and citizen of the State of  
Washington; TREVOR HEIN, an individual and  
citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND BRIEFING  
SCHEDULE FOR MOTION FOR LEAVE  
[ECF #423]**

**[First Request]**

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), Defendant Schroeter Goldmark & Bender, P.S. (“SGB”), and Defendant Reed Hein & Associates d/b/a/ Timeshare Exit Team (“TET” and with SGB, “Defendants”) hereby stipulate to extend the response and reply in support filing deadlines with respect to Plaintiff’s Motion to Leave [ECF #423] (the “Motion”). Plaintiff and Defendant are collectively referred to as the “Parties.”

1. Plaintiff filed the Motion on May 24, 2021.

2. Defendants’ current deadline to file their Responses is June 7, 2021.

3. To adequately respond to Plaintiff’s Motion, and the issues presented therein, the Parties agree that Defendants’ deadline to file a response be extended **June 9, 2021**.

4. Further, to adequately address the issues Plaintiff anticipates will be presented in Defendants’ Response, and because the undersigned will be out of the jurisdiction, the Parties agree that Plaintiff’s deadline to file its Reply in support of the Motion be extended two (2) weeks up to and including **June 30, 2021**.

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5. This is the Parties' first request for extension of these deadlines, and it is not intended to cause any delay or prejudice to any party.

Dated this 4th day of June, 2021.

**GREENSPOON MARDER, LLP**

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IT IS SO ORDERED

  
UNITED STATES DISTRICT JUDGE

DATED: 6/8/2021